

EXHIBIT 11

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

DECLARATION OF DAVID GILL

I, David Gill, hereby declare as follows:

1. I am employed by Hewlett Packard Enterprise (“HPE”) as APJ Counsel for Corporate Securities, Mergers, and Acquisitions. I am currently located in Australia.
2. From 2010-2014, I was employed by Defendant Hewlett-Packard Financial Services Company (HPFS) as Assistant General Counsel, and I also served as counsel for HPFS’s subsidiary, Defendant HPFS India (together with HPFS, the “HPFS Defendants”). In that capacity, I was involved with, and have personal knowledge of, certain events at issue in this litigation.
3. At all times and with respect to all events at issue in this litigation, I was acting exclusively in my role as an employee of, and counsel to, the HPFS Defendants.

4. When I was involved in HPFS India's negotiations of the December 2011 agreements at issue in this litigation (the RRSA and the WSA), I was located in New Jersey.

5. I drafted HPFS India's April 2013 letter to the Chinese police when I was located in Australia.

6. All communications that I had with ICT about the April 2013 letter occurred when I was in Australia.

7. The document produced as DEF0002899 is the final letter submitted to the Chinese police.

8. ICT has never paid any Referral Fee to HPFS India under section 4 of the RRSA.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed June 30, 2021

/s/ David Gill

David Gill